

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF GEORGIA
SAVANNAH DIVISION

IN RE:

SAVANNAH OUTLET SHOPPES, LLC,

Debtor.

CHAPTER 11

CASE NO. 10-42135

**JOINT MOTION FOR CONTINUANCE OF HEARINGS ON DEBTOR'S
DISCLOSURE STATEMENT AND COMM 2006-C8 GATEWAY BOULEVARD
LIMITED PARTNERSHIP'S MOTION TO DISMISS CASE**

NOW COME SAVANNAH OUTLET SHOPPES, LLC ("Debtor"), Debtor-in-Possession in the above-captioned case, and COMM 2006-C8 GATEWAY BOULEVARD LIMITED PARTNERSHIP ("COMM 2006-C8") and file this Joint Motion, respectfully showing the Court as follows:

1.

Debtor filed a voluntary petition for relief under Chapter 11 of the U.S. Bankruptcy Code on October 4, 2010 (the "Petition Date"). Debtor is operating its business as a debtor-in-possession pursuant to 11 U.S.C. §§ 1107 and 1108.

2.

COMM 2006-C8 is Debtor's senior secured creditor and asserts that the pre-petition principal balance of its secured claim exceeds \$9,500,000.

3.

COMM 2006-C8 filed a Motion to Dismiss Debtor's Chapter 11 Case (Dkt. No. 111) on May 23, 2011, which was originally scheduled for hearing on July 26, 2011.

4.

Debtor filed its Plan and Disclosure Statement on July 25, 2011 (Dkt. Nos. 134 and

135), and at the July 26 hearing, requested the court to delay hearing the Motion to Dismiss until such time as the Court could also consider Debtor's Plan and Disclosure Statement.

5.

By Order entered August 1, 2011 (Dkt. No. 145), the Court denied the Motion to Dismiss on an interim basis, continuing hearing on the Motion until the time of hearing on confirmation of Debtor's Plan.

6.

A Notice of Continued Hearing (Dkt. No. 141) was filed, continuing the hearing on the Motion to September 20, 2011, the date on which Debtor's Disclosure Statement was also scheduled for hearing.

7.

Objections to Debtor's Disclosure Statement were filed by COMM 2006-C8 (Dkt. No. 149) and the U.S. Trustee (Dkt. No. 150).

8.

Debtor and COMM 2006-C8 jointly seek a continuance of the hearings on the Motion to Dismiss and Debtor's Disclosure Statement such that they may endeavor to resolve the filed Objections regarding the Disclosure Statement and anticipated Objections regarding Debtor's Plan.

9.

The U.S. Trustee has advised Debtor, through counsel, that he does not object to a continuance of the September 20 hearings for the stated purposes.

WHEREFORE, Debtor and COMM 2006-C8 respectfully request that the Court enter an Order continuing the hearings on Debtor's Disclosure Statement and COMM 2006-C8's Motion to Dismiss to the next available time on the Court's calendar which is not less than thirty (30) days after September 20, 2011, and for such other and further relief as may be just and proper.

This 14th day of September, 2011.

By: /s/ Karen Fagin White
Karen Fagin White
Georgia Bar No. 754450

Mark Bulovic
Georgia Bar No. 094525

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CERTIFICATE OF SERVICE

I, Karen Fagin White, certify that I am over the age of 18 and that on this day, I served a copy of the **JOINT MOTION FOR CONTINUANCE OF HEARINGS ON DEBTOR'S DISCLOSURE STATEMENT AND COMM 2006-C8 GATEWAY BOULEVARD LIMITED PARTNERSHIP'S MOTION TO DISMISS CASE** by U.S. Mail and electronic mail on the following persons, who constitute the parties who timely filed Objections to Debtor's Disclosure Statement:

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Dated: September 14, 2011.

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